

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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<http://www.mt.blm.gov/>

In Reply To:

1112 (930.KV) P

June 14, 2004

EMAIL TRANSMISSION – 6/15/04
Information Bulletin No. MT-2004-070

To: Field Manager, Missoula Field Office

From: Deputy State Director, Division of Support Services

Subject: CASHE Findings Status Update

DD: 07/16/2004

Washington Office Instruction Memorandum No. 2004-185 (Attachment 1) was issued to all field officials on May 26, 2004. It requests the field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment – Safety, Health, and the Environment (CASHE) audits.

Included as Attachment 2 are the findings that were identified during the last CASHE inspection at your facility. The list reflects findings that are not complete based on your last status report to the contractor.

This request is for an update of the following information, where applicable: 1) the status of corrective action for each finding; 2) the point(s) of contact (full names of individuals, not a program, committee, office, or building owner); and 3) facility name changes.

It is imperative that you use the following descriptives to ensure that you are credited for correcting the CASHE deficiencies. Findings are not considered complete unless completion is explicitly stated by the respondent. Listed below are examples of acceptable terms to be used when you describe the status of your incomplete findings:

- unscheduled
- completed in (date if available)
- implemented in (date if available)
- scheduled for completion by (date)
- funding requested; anticipate completion by (scheduled date of completion)
- preliminary planning; anticipate completion by (scheduled date of completion)
- under design; anticipate completion by (scheduled date of completion)
- under construction; anticipate completion by (scheduled date of completion)
- N/A (e.g., if no longer relevant because a facility no longer exists).

(Note: If a finding is no longer relevant, please explain why.)

For those who respond electronically, do not rename or convert the files to a different software as file integrity is critical to the contractor's ability to track the data. If you prefer not to respond electronically, you should print the documents and update them by hand.

You are asked to send the completed table to Karilynn Volk, MT-930, as soon as possible, but no later than **Friday, July 16, 2004**. A consolidated response will be sent to the contractor by July 30, 2004.

Offices with incomplete CASHE findings are to continue to submit quarterly status update reports in accordance with Instruction Memorandum No. MT-2004-018.

If you have questions, please contact Karilynn Volk, at 406-896-5190, or Lisa Engelmann, at 406-896-5193.

Signed by: Sandra L. Guches

Authenticated by: Aleta Zahorodny (MT-930)

2 Attachments

- 1-WO IM 2004-185 (3 pp in its entirety)
- 2-Missoula Field Office CASHE Findings (4 pp)

cc:

(MT-100), Amanda James, CDSO
(MT-073), Vicki Gillam, AO

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

May 26, 2004

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2003-167

EMS TRANSMISSION 06/04/2003
Instruction Memorandum No. 2004-185
Expires: 09/30/2005

To: All Field Officials

From: Assistant Director, Minerals, Realty, and Resource Protection

Subject: Facility Compliance Management and Tracking of CASHE Findings

DD: 07/31/2004

Program Areas: Facility Compliance and Safety.

Purpose: This Instruction Memorandum (IM) asks the Field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment - Safety, Health, and the Environment (CASHE) audits. This information will be used to identify projects for funding from infrastructure improvements money designated in Fiscal Year (FY) 2005 for CASHE corrective actions. In addition, the Bureau of Land Management (BLM) will make use of this data to:

- manage and minimize risk related to facility compliance, and
- identify future funding, policy, and training needs.

Accurate information about facility compliance is necessary for BLM to achieve its strategic planning goal to "Improve Public Safety and Security and Protect Public Resources from Damage."

Background: In FY 2003, 72 percent of BLM's organizational units were rated in good safety, health, and environmental condition. This performance was based on information received in response to Washington Office IM No. 2003-167, which asked the Field to update the status of unresolved CASHE findings. For the FY 2004 Annual Performance Report, organizational units will be considered in good condition if they have one or less incomplete corrective action related to a high priority CASHE finding. The good condition standard will be zero incomplete high priority findings in FY 2005 and subsequent Fiscal Years.

ATTACHMENT 1

The performance measurement data specification that defines high priority CASHE findings and describes how the data will be used is located at: <http://web.wo.blm.gov/ms1/>. The performance goal for FY 2004 is 74 percent of BLM organizational units be in good safety, health, and environmental condition.

Policy/Action: Updating Status of CASHE Recommendations/Corrective Actions:

Organizational units (i.e., Washington Office, State and Field Offices, National Centers) that have had a CASHE audit between October 1993 and February 27, 2004 are asked to update the status of recommendations/corrective actions. This data is to be reported on the spreadsheet that was transmitted separately to every Field Office safety officer and HAZMAT coordinator by their State Office Safety Manager or HAZMAT Program Lead. The spreadsheets and instructions for updating them will be transmitted to each State Office Safety Manager and HAZMAT Program Lead by May 17, 2004 via email. In addition, comments on the status of CASHE findings from draft CASHE reports for audits completed through June 24, 2004, will be incorporated into the status update database.

Implementation of CASHE Recommendations/Corrective Actions: Consistent with available budget resources and other programmatic concerns, organizational units are to implement CASHE recommendations/corrective actions and/or request funding for implementation within one year of the audit. Please note: the instructions for completion of the FY 2004 CASHE Status Update clarify that CASHE corrective actions having Hazard Abatement Plans in place that are prepared and approved in accordance with BLM Manual Handbook 1112-1, Safety and Health Management are considered complete provided funding for their implementation has been formally programmed for completion within two years.

Timeframe: Please return the updated spreadsheets by July 31, 2004. The due date for the status update is earlier than last year's because the Department is requiring that BLM provide its FY 2004 Annual Performance Report data earlier (i.e., first week of October 2004).

Please note: Organizational units that do not respond by July 31, 2004, will:

- have their corrective actions shown as incomplete,
- negatively affect the FY 2004 performance for the CASHE Performance Measure, and
- be ineligible for deferred maintenance funding for CASHE corrective actions.

Budget Impact: None.

Manual/Handbook Sections Affected: None.

Coordination: National Safety Office (WO-740).

Contacts: Ken Morin, Protection and Response Group (WO-360), 303-236-6418; Phyllis McKoy, Occupational Safety and Health (WO-740), 202-501-2788.

Signed by:
Bob Anderson
Acting Assistant Director
Minerals, Realty, and Resource Protection

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

Montana

Organizational Unit: Missoula Field Office
Assessed Facility: Missoula Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
GEC-03-001	Personnel at Garnet Ghost Town enter confined spaces that have not been evaluated for hazards.	03/26/2004	Yes	N/A	2	A) Immediately label the vault "DANGER - PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER;" B) Lock the vault cover to prevent vandalism and unauthorized persons from entering the confined space; C) Correct the spring development deficiencies as identified in a related Potable Water finding; D) Turn the chlorinator off and continue monitoring for coliforms; and E) If the system is free of coliforms, engineer out the confined space by removing the chlorinator and installing curb stops or gate valves depending on the size of the valves; or F) If the water system must be chlorinated, relocate the liquid chlorinator so it can be serviced without entering the vault and install curb stops or gate valves for the remaining valves.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
HAZMAT-03-002	Small propane cylinders are stored inside flammable storage cabinets throughout Field Office facilities.	03/26/2004	No	N/A	3	Remove all small propane cylinders from flammable storage cabinets and store them on shelves.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	

Montana

Organizational Unit: Missoula Field Office
Assessed Facility: Missoula Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
HWMIN-03-001	Potentially excess materials are stored at Field Office facilities.	03/26/2004	No	Class IB	N/A	A) Inform all Field Office personnel to promptly return excess materials to the vendor for credit whenever possible (e.g., when planned projects are canceled); B) Turn excess or unusable hazardous materials in to the Field Office HAZMAT Coordinator for reuse or proper disposal. [Note: The HAZMAT Coordinator will determine whether the materials can be used by another facility, and if not, will arrange for disposal.]; and C) Provide the HAZMAT Coordinator with a storage area (e.g., in flammable storage cabinet in the flammable storage room) where excess hazardous materials can be safely stored awaiting redistribution or disposal.	Not provided	Not provided	
MGUARD-03-001	A tongue guard on a grinder in the shop is not properly adjusted.	03/26/2004	No	N/A	3	A) Purchase or fabricate an adjustable tongue guard and set it the proper settings; or B) Replace the grinder.	Dwight Gappert, Amanda James	Scheduled for completion by August 29, 2003.	
MHS-03-001	Galvanized culverts stored in the wareyard are not secure.	03/26/2004	No	N/A	4	A) Reconfigure culverts in stacks no more than three high; B) Attempt to located another BLM office that can use the culverts; and C) Inspect and repair the chocks.	Chuck Bridgeman	Scheduled for completion by September 28, 2003.	
PW-03-001	The drinking water system at Garnet Ghost Town was not monitored in 2001 to determine compliance with the maximum contaminant level (MCL) for nitrate.	03/26/2004	No	Class IB	N/A	Perform annual nitrate testing for all public drinking water supply systems.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	

Montana

Organizational Unit: Missoula Field Office
Assessed Facility: Missoula Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
PW-03-002	The required repeat and additional routine sampling following a positive coliform result was not properly performed at Garnet Ghost Town.	03/26/2004	No	Class IB	N/A	A) Perform repeat and additional routine sampling at sites in accordance with the guidance provided with this finding; B) Take coliform samples early in the month to ensure that repeat samples can be taken in the same month; C) Contact the State, county, or BLM CASHE Program Lead (Ken Morin at 303-231-6418 or via e-mail at ken_morin@blm.gov) following a positive repeat sample for guidance on what actions should be taken; and D) Post public notifications of MCL violations when applicable and maintain a copy of them.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
PW-03-003	The developed spring at Garnet Ghost Town does not prevent surface water infiltration.	03/26/2004	No	Class IB	N/A	A) Re-grade the area above the spring collection area to divert surface run-on; B) Re-grade the clay cap in the spring area to provide a smooth, sloped surface to prevent infiltration (add clay if necessary to meet original design specifications); C) Periodically grade the area above the spring to prevent run-on and level the depressions in the clay cap; and D) Install a new overflow pipe that terminates in a down-turned U at least 24-inches above grade and screen the overflow pipe to prevent small rodents from climbing into the pipe.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
THS-03-001	The Hazard Communication plan is missing a list of chemicals known to be present at the facility, using chemical names as they appear on their MSDS.	03/26/2004	Yes	N/A	4	A) Modify the plan to include all required information; B) Review the plan annually to ensure it remains current with Field Office operations; and C) Implement the plan at all facilities.	Amanda James	Scheduled for completion by September 28, 2003.	

Montana

Organizational Unit: Missoula Field Office
Assessed Facility: Missoula Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
WCB-03-001	Welding gas cylinders are not stored properly in the Field Office general lockup cage.	03/26/2004	No	N/A	3	A) If cylinders are in frequently use, keep them on the welding cart and keep the leads on them; or B) If the cylinders are being stored or are used infrequently, remove them from the cart, replace the valve caps, separate them by at least 20 feet, and chain them (below the shoulder) to a wall.	Dwight Gappert, Amanda James	Scheduled for completion by September 28, 2003.	